1 2	Attorney at Law 1001 Dove Street, Suite 260					
3	Newport Beach, CA 92660-2885 (949)476-2197 (949)955-2886 facsimile E-Mail: raymondlaw@earthlink.net					
4						
5	Attorney for Defendant, Daniel William Porter					
6	Daniel William I Offer					
7						
8	UNITED STATES DISTRICT COURT					
9	DISTRICT OF NEVADA					
10	UNITED STATES OF AMERICA,) 2:11-CR-00182-MMD-CWH					
11	Plaintiff,) — [PROPOSED] ORDER ON STIPULATION TO					
12) CONTINUE DEFENDANT DANIEL vs.) PORTER'S SELF-SURRENDER DATE					
13	DANIEL WILLIAM PORTER,)					
14	Defendant.					
15						
16	,					
17						
18	IT IS HEREBY STIPULATED AND AGREED, by and between Katherine L. Wong, Assistant					
19	United States Attorney, Eastern District of Virginia, and Paul William Raymond, counsel for Defendant					
20	Daniel William Porter ("PORTER"), that the self-surrender date of PORTER currently set for July 10,					
21	2015, be continued for sixty (60) days to September 8, 2015.					
22	This Stipulation is entered into for the following reasons:					
23	1. Defendant PORTER has a history of medical issues, including cancer. This was addressed in the					
24	Presentence Investigation Report.					
25	2. In arranging his affairs from the date of sentencing (April 9, 2015) to the present date, PORTER					
26	has undergone various medical testing. Doctor Loa issued a statement on June 30 2015,					
27	indicating that PORTER was referred to a pulmonary specialist, Dr. Gene Hong due to an					
28	abnormal x-ray. He was also referred to a dermatologist at Pacific Dermatology for consultation					

1		due to his previous history of melanoma. R	ecent biopsies have come back "abnormal" with		
2	additional biopsies scheduled for July.				
3	3. Dr. Loa also stated that there were delays in obtaining dermatology care due to a lack of doctors				
4	through PORTER's insurance. Dr. Loa recommends that PORTER finish his medical checkups				
5	before incarceration.				
6	4.	4. PORTER also has some dental work scheduled in July, but that is not as important or urgent as			
7	the melanoma concerns.				
8	5.	5. The additional time requested is not sought for the purpose of delay but merely to allow PORTER			
9	to seek appropriate medicare care and treatment.				
10	6. Counsel for PORTER has communicated with Katherine L. Wong, AUSA, and based on the				
11		representations regarding PORTER's medical condition, and the agreement not to seek any			
12	further extensions, the Government has agreed not to oppose.				
13	This is the first request and no further extensions will be sought.				
14		Dated this 2 nd day of July, 2015.			
15					
16	Dated	: July 2, 2015	PAUL WILLIAM RAYMOND Counsel for Defendant		
17			DANIEL WILLIAM PORTER		
18			By: <u>/s/ Paul William Raymond</u>		
19			, <u> </u>		
20	20				
21	Dated: July 2, 2015		By: /s/ Katherine L. Wong Katherine L. Wong, Esq.		
22			Attorney for United States Department of Justice		
23					
24					
25					
26					
27					
28	$28\parallel$				

1	UNITED STATES DISTRICT COURT				
2	DISTRICT OF NEVADA				
3 4 5 6 7 8 9	UNITED STATES OF AMERICA, Plaintiff, Vs. DANIEL WILLIAM PORTER, Defendant. Defendant.				
10 11	Based on the pending Stipulation of Counsel, and good cause appearing,				
12					
13					
14					
15	Dated this 6th day of July, 2015.				
16171819	United States District Judge				
20					
21					
22					
23					
24					
25					
26					
27					
28					

1 **CERTIFICATE OF ELECTRONIC SERVICE** 2 The undersigned hereby certifies that a copy of the foregoing PROPOSED ORDER ON STIPULATION TO CONTINUE DEFENDANT DANIEL PORTER'S SELF-SURRENDER DATE 3 4 was served on all parties named below by electronic service (ECF) on July 2, 2015: 5 6 7 Daniel G. Bogden United States Attorney 8 Nicholas D. Dickinson United States Attorney 9 333 Las Vegas Blvd. South Las Vegas, NV 89101 10 11 United States Department of Justice Katherine Wong 12 Assistant United States Attorney Eastern District of Virginia 13 2100 Jamieson Avenue Alexandria, VA 22314 14 15 John R. Lusk Attorney at Law 517 S. Third Street 16 Las Vegas, NV 89101 17 Local counsel for Daniel William Porter 18 19 20 21 /s/ Paul Wiliam Raymond PAUL WILLIAM RAYMOND 22 Attorney for Defendant DANIEL WILLIAM PORTER 23 24 25 26 27 28